UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

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| WOR | LDNFT | COMPAN | IIES | INC | |
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| A Flo | rida Corp | oration. | | | |

Plaintiff.

v. CASE NO.: 00-6206 CIV-FERGUSON

KLELine, a Limited Company, a corporation incorporated under the laws of France; ABDALLAH HITTI, individually; AYHUB HITTI, individually; BANQUE PARIBAS S.A., a banking corporation incorporated under the laws of France; OCRAM EST., a Liechtenstein corporation; and MICHAEL BENDE, individually,

Defendants.



DEFENDANT KLELINE'S **AGREED MOTION**TO EXTEND TIME TO SERVE RESPONSE

Defendant KLELine, through its undersigned counsel, Winthrop, Stimson, Putnam & Roberts, respectfully moves this Court for the entry of an order extending the time to serve its response to the summons and complaint through and including March 1, 2000. In support of the foregoing, defendant KLELine states:

- 1. Upon information and belief, a copy of the Complaint intended for defendant KLELine was left at defendant Paribas' offices in New York on or about January 18, 2000.
- 2. **Plaintiff has agreed** that defendant KLELine's response (whether it be a motion, answer or otherwise) in this action shall be due on or before March 1, 2000.



- 3. As stated above, and as Plaintiff has agreed, this motion and entry of order pursuant hereto does not constitute a consent to personal jurisdiction, and shall not act as a waiver of or affect in any way Defendant KLELine's right to object to service of process or personal jurisdiction, or to assert or move with respect to any other procedural or substantive matter or defense.
- 4. This motion is made in good faith and not for purposes of delay, the request for an extension of time will not prejudice any party.

WHEREFORE, defendant KLELine hereby respectfully requests that its motion be granted and that the Court enter an order in the form submitted herewith.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a copy of the foregoing was sent by facsimile and mail on this 11th day of February, 2000 to John Rayson, Esq., LAW OFFICES OF JOHN C. RAYSON, Second Floor, 2400 E. Oakland Park Blvd., Fort Lauderdale, Florida 33306.

By Milliam) Mc Fathern WINTHROP STIMSON PUTNAM &

ROBERTS

Attorneys for Defendant Paribas 125 Worth Avenue Palm Beach, Florida 33480 (561) 655-7297

Counsel

J. Portis Hicks WINTHROP, STIMSON, PUTNAM & **ROBERTS** Attorneys for Defendant Paribas One Battery Park Plaza New York, New York 10004 (212) 858-1754